

TECHNICAL MEMORANDUM

Utah Coal Regulatory Program

May 10, 2007

TO: Internal File

THRU: Pamela Grubaugh-Littig, Permit Supervisor *pal*

FROM: Wayne H. Western, Team Lead *W44*

RE: Appendix X, GVH # 10 through # 17, Andalex Resource Inc., Centennial Mine, C/007/0019, Task ID #2803

SUMMARY:

On March 16, 2007, the Division received an amendment from Andalex Resources Inc. to drill eight primary and seven alternate gob vent holes. They are located on the Deadman 7.5 minuet quadrangle in Township 12 South Range 8 East, Sections 31 and 36. The Permittee intends to facilitate the uninterrupted mining and maximum recovery of the coal by lowering the percentage of methane gas in the mine.

On May 9, 2007, the Permittee responded to the deficiencies in Task 2766 with additional information. This memo will address the engineering and bonding.

TECHNICAL MEMO

TECHNICAL ANALYSIS:

OPERATION PLAN

MINING OPERATIONS AND FACILITIES

Regulatory Reference: 30 CFR 784.2, 784.11; R645-301-231, -301-526, -301-528.

Analysis:

The Permittee meet the requirements of this section of the regulations. The Permittee gave a general description of the gob vent holes in Chapter 5. The Permittee plans to drill eight new gob hole vents to reduce the amount of methane gas on panel #10. In addition, the Permittee wants to receive permission to dill an addition seven contingency holes should conditions warrant.

The Division approved all aspects of the seven additional holes with the acception of the bond. In Section 111 of the MRP, the Permittee committed not to drill the any of the additional seven holes until they post adequate bond.

Findings:

The information in the proposed amendment is considered adequate to meet the requirements of this section.

RELOCATION OR USE OF PUBLIC ROADS

Regulatory Reference: 30 CFR 784.18; R645-301-521, -301-526.

Analysis:

The Permittee met the minimum requirements of this section. The Permittee will not use or relocate a public road. The Permittee will use existing jeep trails and pipeline corridors for general access. The Permittee will construct some ancillary as needed for access.

Findings:

The Permittee met the minimum requirements of this section.

ROAD SYSTEMS AND OTHER TRANSPORTATION FACILITIES

Regulatory Reference: 30 CFR Sec. 784.24, 817.150, 817.151; R645-301-521, -301-527, -301-534, -301-732.

Analysis:

Road Classification System

The Permittee met the requirements of this section by classifying all new roads associated with the gob vent holes as ancillary.

Plans and Drawings

The Permittee met the requirements for maps and cross sections. The Permittee described the roads in Section 527 of the MRP and showed the location of the roads used to access holes 10, 11A, 12, 12A, 15, 16A. The rest of the holes should be accessed from existing roads or jeep trails.

Performance Standards

The Division will inspect the site to make sure that performance standards are kept.

Findings:

The Permittee met the minimum requirements for this section.

RECLAMATION PLAN

MINE OPENINGS

Regulatory Reference: 30 CFR Sec. 817.13, 817.14, 817.15; R645-301-513, -301-529, -301-551, -301-631, -301-748, -301-765, -301-748.

Analysis:

The Permittee met the requirements of this section by providing a plan in Section 542.700 of the MRP that meet all State and federal requirements.

Findings:

The Permittee met the minimum requirements of this section.

TECHNICAL MEMO

ROAD SYSTEMS AND OTHER TRANSPORTATION FACILITIES

Regulatory Reference: 30 CFR Sec. 701.5, 784.24, 817.150, 817.151; R645-100-200, -301-513, -301-521, -301-527, -301-534, -301-537, -301-732.

Analysis:

Reclamation

The Permittee met the requirements of this section to reclaim the roads as outline in Section 542.600 of the MRP.

Findings:

The Permittee met the minimum requirements of this section.

BONDING AND INSURANCE REQUIREMENTS

Regulatory Reference: 30 CFR Sec. 800; R645-301-800, et seq.

Analysis:

General

The Permittee did meet the requirements of this section. The Permittee updated the reclamation cost estimate to include the eight drill holes. The Permittee committed in Section 111 of the MRP not to drill any of the seven alternative holes until bond is posted. The Permittee most likely will post a separate bond for each hole.

Findings:

The information in the proposed amendment is adequate to meet the requirements of this section of the regulations.

RECOMMENDATIONS:

The Division should approve the amendment.